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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING
MOTION TO SEAL**

Judge: Hon. Susan van Keulen

[PROPOSED] ORDER

Before the Court is Plaintiffs' Administrative Motion to Consider Whether Portions of Plaintiffs' Request for an Order to Show Cause re: Sanctions (Dkts. 494, 495) ("Motion").

Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document	Text To Be Sealed	Basis for Sealing Portion of Document
Plaintiffs' Supplement in Support of Their Motion for Order For Google To Show Cause for Why It Should Not Be Sanctioned for Discovery Misconduct	GRANTED as to the portions at: Pages 2:5, 2:8-16, 2:19, 2:21-22; 3:3, 3:5, 3:7, 3:22-23; 4:1-2, 4:11, 4:17-18, 4:22; 5:2, 5:20; 6:2, 6:8, 6:10-11, 6:22, 6:24, 6:26-27; 7:2, 7:8, 7:10, 7:16-20, 7:22-24; 8:3	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal project, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Second Declaration of Mark C. Mao in Support of	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly

<p>1 Plaintiffs' Order to Show</p> <p>2 Cause Motion</p>	<p>3 Pages 1:14, 1:17, 1:21-</p> <p>4 23; 2:12, 2:22, 2:24; 3:1-</p> <p>5 2, 3:16, 3:21, 3:26; 4:1-4,</p> <p>6 4:8-14, 4:16, 4:20</p>	<p>7 confidential and proprietary</p> <p>8 information regarding highly</p> <p>9 sensitive features of Google's</p> <p>10 internal systems and operations,</p> <p>11 including various types of Google's</p> <p>12 internal project, data signals and</p> <p>13 logs and their proprietary</p> <p>14 functionalities, as well as internal</p> <p>15 metrics, that Google maintains as</p> <p>16 confidential in the ordinary course</p> <p>17 of its business and is not generally</p> <p>18 known to the public or Google's</p> <p>19 competitors. Such confidential and</p> <p>20 proprietary information reveals</p> <p>21 Google's internal strategies, system</p> <p>22 designs, and business practices for</p> <p>23 operating and maintaining many of</p> <p>24 its important services, and falls</p> <p>25 within the protected scope of the</p> <p>26 Protective Order entered in this</p> <p>27 action. See Dkt. 81 at 2-3. Public</p> <p>28 disclosure of such confidential and</p> <p>proprietary information could affect</p> <p>Google's competitive standing as</p> <p>competitors may alter their systems</p> <p>and practices relating to competing</p> <p>products. It may also place Google</p> <p>at an increased risk of cybersecurity</p> <p>threats, as third parties may seek to</p> <p>use the information to compromise</p> <p>Google's internal practices relating</p> <p>to competing products.</p>
<p>20 Mao Decl., Exhibit 1</p> <p>21 (GOOG-BRWN-00536949)</p>	<p>22 GRANTED as to the</p> <p>23 portions at:</p> <p>24 Entirety</p>	<p>25 The information requested to be</p> <p>26 sealed contains Google's highly</p> <p>27 confidential and proprietary</p> <p>28 information regarding highly</p> <p>sensitive features of Google's</p> <p>internal systems and operations,</p> <p>including various types of Google's</p> <p>internal project, data signals and</p> <p>logs and their proprietary</p> <p>functionalities, as well as internal</p> <p>metrics, that Google maintains as</p> <p>confidential in the ordinary course</p> <p>of its business and is not generally</p> <p>known to the public or Google's</p> <p>competitors. Such confidential and</p> <p>proprietary information reveals</p>

		<p>Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
Mao Decl., Exhibit 2	<p>GRANTED as to the portions at:</p> <p>Entirety</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal project, data signals and logs and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity</p>

		threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Mao Decl., Exhibit 3 (Excerpts of the Deposition Transcript of Dr. Caitlin Sadowski)	GRANTED as to the portions at: Pages 18:23-24; 19:6-7, 19:10; 22:2-3; 23:8-9, 23:21-22; 24:2, 24:8-9; 64:11-12; 65:1; 66:15-20; 67:25-68:1; 68:6-8, 68:17-19, 68:22-23; 69:5-6, 69:8-10, 69:15-16; 69:25-70:1; 70:3,5-6, 70:18, 70:21, 70:23; 71:8-72:2; 72:20-25; 73:5-6, 73:14-15, 73:17-22; 74:1-3, 74:6-8, 74:10, 74:17-18, 74:25; 75:1, 75:17-20, 75:24-25; 76:1-2, 76:13-14, 76:24-25; 77:20-23; 78:3-4, 78:13-14; 80:8-9, 80:13, 80:16, 80:24; 81:3-5, 81:7, 81:12-14; 82:6-8, 82:10, 82:12, 82:23; 83:21-22; 84:7-10, 84:13-14; 85:3, 85:11, 85:15; 86:18,2 86:5; 87:4, 87:10, 87:15-17, 87:23; 88:4, 88:10; 89:15-22, 89:24; 90:10-11; 91:2-4, 91:8, 91:11-13, 91:17; 92:11	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal project, data signals and logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Mao Decl., Exhibit 4 (Excerpts of the Deposition Transcript of Mandy Liu)	GRANTED as to the portions at: Pages 14:22, 14:24; 15:4, 15:7, 15:10-12, 15:14-15, 15:18, 15:25; 18:1, 18:3-4, 18:14, 18:18-20, 18:24; 19:3, 19:8, 19:11, 19:16, 19:22, 19:25; 20:1; 39:1-2, 39:8, 39:10;	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal project, data signals and logs and their proprietary functionalities, as well as internal

1		40:5-6, 40:9, 40:11-12;	metrics, that Google maintains as
2		41:7, 41:10; 42:2, 42:8,	confidential in the ordinary course
3		42:11, 42:16; 43:1, 43:15	of its business and is not generally
4			known to the public or Google's
5			competitors. Such confidential and
6			proprietary information reveals
7			Google's internal strategies, system
8			designs, and business practices for
9			operating and maintaining many of
10			its important services, and falls
11			within the protected scope of the
12			Protective Order entered in this
13			action. See Dkt. 81 at 2-3. Public
14			disclosure of such confidential and
15			proprietary information could affect
16			Google's competitive standing as
17			competitors may alter their systems
18			and practices relating to competing
19			products. It may also place Google
20			at an increased risk of cybersecurity
21			threats, as third parties may seek to
22			use the information to compromise
23			Google's internal practices relating
24			to competing products.

15
16 **SO ORDERED.**

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18
19 DATED: _____

HON. SUSAN VAN KEULEN
United States Magistrate Judge